



Indiana Housing Finance Authority
Community Development Procedural Changes
HOPWA
Effective June 27, 2002

Suspension Policy – *Effective for all open awards*

The IHFA Suspension Policy has been revised to include four varying levels of suspension. Examples of each suspension level are given below. The list provided, however, is not intended to be comprehensive. Entities may be suspended for performance problems or other issues not listed as examples.

IHFA will hold all responsible parties – award recipients, project sponsors, subrecipients, and administrators - accountable for award performance. IHFA, in its sole discretion, may suspend or disbar individual persons as well as organizations from participation in IHFA funding programs.

IHFA reserves the right to alter the specific terms of a suspension for reasons including, but not limited to, an award recipient's, project sponsor, subrecipient's, or administrator's response to concerns, past performance history, and IHFA objectives.

LEVEL 1: Suspended from drawing funds and/or submitting funding applications until issue is resolved

- Staff recommendation – This could include, but is not limited to, a lack of performance on an existing award, entities unprepared for a compliance monitoring, or deficiencies noted during a review of required reporting.
- Any overdue IHFA required report including, but not limited to; Semi-Annuals Reports. Reports will be considered overdue on the 10th calendar day following due date.
- An overdue monitoring response.
- Unresolved issues remaining after an award recipient's 2nd monitoring response.
- Any overdue documentation required by IHFA.

LEVEL 2: Suspended from drawing funds and/or submitting funding applications for up to 6 months

- Any Level 1 Suspension that has remained uncorrected for 3 months.
- A project sponsor serving over income/non-eligible clients.
- A project sponsor failing to collect the appropriate certifying documentation on a client prior to providing assistance.

LEVEL 3: Suspended from drawing funds and/or submitting funding applications for up to 5 years

- Any Level 2 Suspension that has remained uncorrected for 3 months.
- A project sponsor with multiple compliance issues and/or repeated violations.
- A project sponsor with egregious issues or that has committed negligent activities.

LEVEL 4: Permanent disbarment from all IHFA programs

- A project sponsor that shows intentional disregard and violates IHFA and/or HUD regulations and policies.

Claim Forms and Draw Policy - *Effective for all open awards with funds remaining to draw*

- Recipients will be required to submit 100% support documentation to draw funds.
- All client applications must contain a copy of the item to be paid (lease, mortgage coupon, utility bill, etc.) and documentation of income before funds will be released.
- Recipients will be required to submit a **Receipt of Payment Form** within 21 days of the IHFA direct deposit date to verify that all entities have been paid. (The form will be sent under separate cover)

Beneficiary Requirement - *Effective for all open awards*

- Project Sponsors are required to ensure that all HOPWA beneficiaries meet the following requirements:
 1. There must be at least one person in the household with acquired immunodeficiency syndrome or related diseases.
 2. The household can not have an income that exceeds 80% area median income limits.
 3. The household must reside in Indiana
 4. Any household receiving HOPWA assistance must be in engaged in care coordination/case management.

Completion Reports - *Effective for awards made on or after June 27, 2002*

- IHFA will retain 5% of the final draw until a completion report with full beneficiary information and all other requested documentation has been submitted and approved by IHFA staff.

Closeout Documentation - *Effective for all open awards*

- IHFA will withhold the final payment on HOPWA awards until all close-out documentation and all other requested supporting documentation, has been submitted and approved by IHFA staff.